

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,
et al.,

f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09- 50026 (REG)

Hearing Date: TBD

Objection Deadline: TBD

**FIRST INTERIM QUARTERLY APPLICATION OF LEGAL ANALYSIS
SYSTEMS, INC. FOR INTERIM COMPENSATION AND REIMBURSEMENT OF
EXPENSES WITH RESPECT TO SERVICES RENDERED AS CONSULTANT ON THE
VALUATION OF ASBESTOS LIABILITIES TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS HOLDINGS ASBESTOS-RELATED CLAIMS FOR THE
PERIOD APRIL 28, 2010 THROUGH MAY 31, 2010**

Name of Applicant:

LEGAL ANALYSIS SYSTEMS, INC.

Authorized to Provide Professional Services to:

The Official Committee of
Unsecured Creditors Holding
Asbestos-Related Claims of Motors
Liquidation Company, *et al.*

Date of Retention:

April 6, 2010 *nunc pro tunc*
to March 15, 2010

Period for which
Compensation and
Reimbursement are sought:

April 28, 2010 through
May 31, 2010

Amount of Compensation
sought as actual, reasonable
And necessary

\$34,232.00

Amount of Expense
Reimbursement sought as
actual, reasonable
and necessary

\$969.19

This is an: x interim quarterly final application.

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SYSTEMS, INC. FOR INTERIM COMPENSATION AND REIMBURSEMENT OF
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UNSECURED CREDITORS HOLDINGS ASBESTOS-RELATED CLAIMS FOR THE
PERIOD APRIL 28, 2010 THROUGH MAY 31, 2010**

Pursuant to 11 U.S.C. §§ 330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and the Administrative Order, Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals (the "**Administrative Order**"), the consulting firm of LEGAL ANALYSIS SYSTEMS, INC. ("**Legal Analysis Systems**") hereby submits this first interim application ("**First Interim Application**") for an Order awarding it interim compensation for professional consulting services rendered as consultant on the valuation of asbestos liabilities to the Official Committee of Unsecured Creditors Holding Asbestos-Related Claims (the "**Asbestos Claimants Committee**") of the debtor, Motors Liquidation Company, *et. al.*, ("**Debtor**"), in an amount of \$ 34,332.00, together with reimbursement of Legal Analysis System's actual and necessary expenses incurred in the amount of \$ 969.19, for the period commencing April 28, 2010 through

May 31, 2010 (the "**Application Period**"). In support of this First Interim Application, Legal Analysis Systems, Inc., respectfully represents as follows:

I. JURISDICTION

1. This Court has subject matter jurisdiction pursuant to 11 U.S.C. §331.

II. BACKGROUND

2. On June 1, 2010 (the "**Petition Date**"), the Debtor filed a voluntary petition for relief under Chapter 11 under Title 11 of the United States Code (the "**Bankruptcy Code**").

3. From the Petition Date through the date of this First Interim Application, the Debtor has continued to operate its businesses and manage its properties as debtor-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

4. On March 2, 2010, the Office of the United States Trustee appointed the Asbestos Claimants Committee pursuant to section 1102 of the Bankruptcy Code. The Asbestos Claimants Committee is compromised entirely of persons who hold pending claims against the Debtor for asbestos-related personal injury or wrongful death.

5. On March 18, 2010, the Asbestos Claimants Committee filed and served its Application For Entry Of An Order Nunc Pro Tunc To March 15, 2010 authorizing the employment of Legal Analysis Systems as consultant on the valuation of asbestos liabilities to the Official Committee Of Unsecured Creditors Holding Asbestos-Related Claims. On April 6, 2010, the Court entered an order, approving the retention application.

III. RELIEF REQUESTED

6. By this First Interim Application, Legal Analysis Systems seek allowance and payment of \$ 34,232.00 in fees for services rendered during the Application Period and reimbursement of \$ 969.19 for reasonable and necessary expenses incurred during the

Application Period. Thus, Legal Analysis Systems seeks allowance and payment in the total amount of \$ 35,201.19.

7. Legal Analysis Systems has received no payment and no promises for payment from any source for services rendered during the Application Period in connection with the case. There exists no agreement or understanding between Legal Analysis Systems and any other person for the sharing of any compensation to be received for services rendered by Legal Analysis Systems in the case.

8. All services for which compensation is requested by Legal Analysis Systems pursuant to this Application were performed for or on behalf of the Asbestos Claimants Committee in this case.

9. This is Legal Analysis System's First Interim Application.

IV. SUMMARY OF SERVICES RENDERED

10. The professionals at Legal Analysis Systems who have provided services to or for the Asbestos Claimants Committee in this case and their standard hourly rates during the Application Period were as follows:

<u>Name</u>	<u>Position</u>	<u>Years Experience</u>	<u>Rate</u>
Peterson	Attorney/ Social Psychologist	38	\$800
Relles	Statistician	42	\$475
Ebener	Social Science Researcher	33	\$335

11. Legal Analysis Systems has maintained detailed records of the time spent in the rendition of professional services for the Asbestos Claimants Committee during the Application Period. Attached hereto as Exhibit A and incorporated herein by reference is a true and correct copy of the monthly billing statement prepared for the services rendered in this case by Legal Analysis Systems (the "**Billing Statement**"). The Billing Statement is in the same form regularly used by Legal Analysis Systems to bill its clients for services rendered and includes the date that the services were rendered, a detailed, contemporaneous narrative description of the services, the amount of time spent for each service and the designation of the professional who performed the service. In addition, attached hereto as Exhibit B and incorporated herein by reference is a summary by category of the professional services provided during the Application Period.

12. As set forth on Exhibits A and B, Legal Analysis Systems rendered 83.10 hours of professional services during the Application Period, resulting in legal fees totaling \$ 34,232.00 and associated reasonable and necessary expenses totaling \$ 969.19.

13. The total value of the services rendered by Legal Analysis Systems as shown on Exhibit B, broken down among the persons rendering the services is as follows*:

<u>Name</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Value</u>
Peterson	11.60	\$800	\$9,280.00
Relles	20.30	\$475	\$9,642.50
Ebener	51.20	\$335	\$15,309.50
Total	83.10		\$34,232.00

* Nonworking travel time is billed at one-half the professional's usual hourly rate. See Exhibit A, Task Code .I for breakdown.

14. Set forth below are the rates for the expenses incurred by Legal Analysis Systems for which reimbursement is requested pursuant to this Application, as well as the basis for such rates for the identified expense items:

- a) The expenses during this Application Period were for Travel.

15. Attached hereto as Exhibit C and incorporated herein by reference is a summary by category of the expenses incurred by Legal Analysis Systems for which reimbursement is requested. This information also appears on Exhibit A hereto. Further supporting documentation is available upon request.

16. Legal Analysis Systems provides expert services regarding investigation, analysis and valuation of personal injury claims in bankruptcy and litigation related matters. The services that Legal Analysis Systems has performed and will continue to perform for the Asbestos Claimants Committee include, but are not limited to, the following:

- a) development of oversight methods and procedures so as to enable the Asbestos Claimants Committee to fulfill its responsibilities of reviewing and analyzing any proposed Disclosure Statement, Plan, and other similar documents in this reorganization proceeding;

- b) review and analyses of the Debtor's asbestos claims database and review and analysis of the Debtor's resolution of various Asbestos Claims;

- c) estimation of the Debtors' liability for Asbestos Claims that are pending at the present time as well as those that will be filed in the future;

- d) quantitative analyses of alternative claims resolution procedures include estimation of payments that would be made to various types of claims under those alternatives and development of cash flow analysis of an asbestos compensation trust under alternative procedures;

e) evaluation of reports and opinions of experts and consultants retained by other parties to these bankruptcy proceedings;

f) evaluations and analyses of proposed proofs of claims and bar dates and analyses of data from proofs of claim for asbestos claims;

g) quantitative analyses of other matters related to the Asbestos Claims as may be requested by the Asbestos claimants Committee; and

h) testimony on such matters as is required by the Asbestos claimants Committee.

17. The generality of the foregoing description is amplified on a day-to-day basis by the Billing Statement attached as Exhibit A.

18. Thus, through this First Interim Application, Legal Analysis Systems seeks interim allowance and payment of \$ 34,232.00 in fees and \$ 969.19 in expenses. A Notice of First Interim Application will be filed and served on all parties requesting notice under Bankruptcy Rule 2002.

19. A cumulative summary of Caplin & Drysdale for services rendered and reimbursement of expenses as Counsel to the Committee is attached as Exhibit D for the period April 28, 2010 through May 31, 2010.

V. ALLOWANCE OF COMPENSATION

20. Legal Analysis Systems has endeavored to represent the Asbestos Claimants Committee in the most expeditious and economical manner possible.

WHEREFORE, Legal Analysis Systems, respectfully requests that the Court enter an Order approving this Application and directing payment of \$ 34,232.00 in fees and reimbursement of \$ 969.19 in expenses, and for such other and further relief as the Court deems just and proper.

LEGAL ANALYSIS SYSTEMS, INC.

Mark A. Peterson (APR)

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*Valuation Consultant to the Official Committee
Of Unsecured Creditors Holding Asbestos-
Related Claims of Motors Liquidation Company*

Dated: August 5, 2010

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY,
et al.,
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09- 50026 (REG)

**ORDER AWARDING COMPENSATION
AND REIMBURSEMENT OF EXPENSES**

The Court considered the First Interim Quarterly Application of LEGAL ANALYSIS SYSTEMS, INC. ("Legal Analysis Systems"), For Interim Compensation And Reimbursement Of Expenses As Consultant On The Valuation Of Asbestos Liabilities To The Official Committee of Unsecured Creditors Holding Asbestos-Related Claims of Motors Liquidation Company (the "Application"), which Application requests allowance and payment of compensation and reimbursement of expenses in accordance with §330 and §331 of the Bankruptcy Code, and it appearing that notice of the Application was duly given in accordance with the provisions of the Bankruptcy Rules, and no further notice being necessary, and upon the record being made before this Court, and after due deliberation, and sufficient cause appearing therefore, it is hereby;

ORDERED that the Application is granted;

FURTHER ORDERED that the Debtor is directed to pay immediately any remaining unpaid fees and expenses requested in the Application.

Dated: _____, 2010

Honorable Robert E. Gerber
United States Bankruptcy Court Judge